UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

FEB 2 8 2012

Mr. Stephen Farley
CH2M Hill
155 Grand Ave, Suite 800
P.O. Box 12681
Oakland CA 94604-2681

RE: November 29, 2011 Request for A Determination of No Further Action for Building 688 UL#01 Polychlorinated Biphenyl (PCB) Site in Investigation Area (IA) C2, Former Mare Island Naval Shipyard, Vallejo, California

Dear Mr. Farley:

EPA has reviewed your November 29, 2011 summary report for the above referenced PCB site. Building 688 is a 1,225 square foot, fenced, active electrical transformer substation located on the western exterior wall of Building 688. You are proposing a combination of high occupancy closure pursuant to the default substantive cleanup requirements (SCRs) of paragraph 8 of the Consent Agreement and Final Order for the fenced transformer pad, and low occupancy closure pursuant to the default SCRs of paragraph 8 of the CA/FO for the active underground electrical vault. EPA concurs with the low occupancy closure for the electrical vault, however it appears additional verification sampling is warranted for the transformer pad.

Building 688 UL#01 formerly housed five transformers presumed to have contained PCBs; all were removed by the Navy in 1986, and were replaced in 1987 by four dry transformers, a rocker arm assembly, and four electrical switch cabinets which remain active. PCBs were found in transformer pad in concentrations as high as 16,400 mg/kg in a chip sample collected in 1996. The pad was subsequently washed and scabbled under several actions. Currently, PCBs still remain in the pad in concentrations as high as 8.4 mg/kg. During a site visit on February 13, 2012, it appeared that the figure submitted with your November 29, 2011 report does not match the locations on the pad that were scabbled. Further, the distribution of samples collected from the pad does not appear to include verification of all of the areas that were scabbled. Your report indicates the locations of several of the confirmation samples are unknown. Also, given the initial high concentrations found at the site and the fact that a decade has passed between the time the transformers were removed and the time the pad was sampled, it raises the question of whether or not the pad was adequately characterized, and if the original configuration of PCB containing equipment is unknown. Please collect additional verification samples to confirm remaining concentrations in the pad and resubmit your report with correct figures.

PCBs were also found in two sediment samples in the subterranean vault collected from each of the two manholes, which were found to contain 15 and 17 mg/kg. The remaining PCB concentrations within the vault are below 25 mg/kg, consistent with a default SCR of paragraph 8(a)(ii)(B) of the CA/FO; provided that a low occupancy deed restriction is placed on the vault.

Please contact Carolyn d'Almeida at (415) 972-3150 if you have any questions about this letter.

Sincerely,

for Michael Montgomery

Michael Montgomery
Assistant Director
Federal Facilities and Site Cleanup Branch

cc: Janet Naito, DTSC